

This is the statement of general policy and arrangements for:



## Who we are

Our website address is: <https://aditinet.uk>

## Privacy and Cookie Policy

### Privacy Notice

Aditinet UK Ltd ('Aditinet UK') respects your privacy and is committed to protecting your personal information. This Privacy Notice will inform you as to how we look after your personal information when you contact us, visit our websites (regardless of where you visit it from) and/or use Aditinet TEQ app.

Please read this Privacy Notice carefully to understand our views and practices and your rights regarding your personal information and how the law protects you. By using the Aditinet TEQ app or visiting our websites you are accepting the practices described in this Privacy Notice.

For the purposes of this Privacy Notice a 'Customer' is a person or organisation who has a contract with Aditinet UK. In this case, Aditinet UK acts as a Data Processor of information.

Where Aditinet UK processes your personal data for all other circumstances set out in this Privacy Notice, Aditinet UK acts as a Data Controller of this information. Both processing activities are dealt with under the provisions of the Data Protection Laws (Data Protection Act 2018 and the EU General Data Protection Regulation).

Aditinet UK must have a lawful basis to process your personal information, and this Privacy Notice explains what our lawful basis is in respect of each purpose for which we keep and use information about you. Generally, we are allowed to process your personal information where you have either provided consent, it is necessary in connection with a contract between us (such as a contract to supply our services to you as a Customer), where it is necessary in order for us to comply with our legal obligations, or where we have a legitimate interest to do so (but we will always consider whether your right to privacy overrides our interest).

Details of how to contact us if you have any questions about privacy or data protection can be found in the Contact Us section of our website.

### What information do we collect from you?

We will only require you to provide personal information to us where it is necessary for us to provide you with a service at your request. We will collect and process the following personal information about you:

- **Information you give us.** This is information about you that you give us by providing information through our websites, interactive services (such as

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Aditinet TEQ app) or by corresponding with us by phone, email or otherwise. The information you give us may include individual and business contact information (such as name, company name, physical address, email address, and telephone number); customer information such as their name, address, contact details. If you are an employee of one of our Customers, the data is used in conjunction with any services you have requested from us, i.e. complaints, queries, sales support, etc.

- **Information we collect from your use of our website.** With regard to each of your visits to our website we will automatically collect the following information: technical information, such as the Internet protocol (IP) address used to connect your device to the Internet, whereabouts you connected to our service, your internet service provider (ISP), and what type of device you are using to access our service;

Please note that our websites are not intended for children and we do not knowingly collect personal information relating to children.

- **Information about your use of our services** such as details of your visits to our websites and the resources that you access, including, but not limited to, website pages, links, traffic data, location data, weblogs and other communication data;
- **Information we collect when you call us.** If you call us we will automatically collect the following information: the phone number used to call us a recording of all inbound and outbound calls.

## How do we use this information?

We use this information in the following ways:

- **Information you give to us.** We use this information:
  - in order to take steps necessary to assess whether we can enter into a contract with you and in order to perform our contract with you. This includes carrying out our obligations to you and providing you with our products and services;
  - for the purpose of improving our services to you, to ensure that content from our websites and Apps are presented in the most effective manner for you and for your device;
  - to review and improve the performance of our systems, processes and staff (including training);
  - to deal with any legal queries relating to your use of our services;
  - to verify your identity - where it is necessary for us to do so in order to meet our legal obligations or to detect and prevent fraud, money-laundering and other crimes;
  - to contact you in order to respond to your complaints, queries and questions or let you know about important changes. We will only use your information in this respect where it is necessary so that we can:
  - interact and respond to any communications you send us, including where you use the Contact Us section of our website, and any social media posts that you tag us in;
  - to provide Customers with marketing communications including information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
  - based on a legitimate interest, to provide marketing communications to: new Customers with information about services we may offer; customers with information about third party products or services which the recipient has explicitly consented to.
- **Information we collect from your use of our websites.** We will use this information in order for the following purposes:

- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
  - to improve our site to ensure that content is presented in the most effective manner for you and for your device;
  - as part of our efforts to keep our site safe and secure;
  - to measure or understand the effectiveness of advertising we serve to Customers, and to deliver relevant advertising to you.
- **Information we receive from other sources.** See the "Who might we share your information with?" section below for details of how we use your information in conjunction with our associated third parties.
  - **Protecting you and others from harm** - We may use your information where it is necessary to protect your interests, or the interests of others. This may include in the event of criminality such as identity theft or fraud.

We need all the categories of information listed above to allow us:

- to enter into and perform our contract with you;
- to enable us to comply with legal obligations; and
- to pursue legitimate interests of our own or those of third parties (provided your interests and fundamental rights do not override those interests).

## Change of purpose

We will only use your personal information for the purposes for which we have collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required by law.

## How long do we keep hold of your information?

Aditinet UK will only store your personal information for as long as we need it for the purposes for which it was collected. Where we provide you with any service, we will retain any information you provide to us at least for as long as we continue to provide that service to you or have a legal basis to do so.

- We will keep information for the period of time that is necessary to fulfil the original purpose for which we collected the information, up to a maximum of 7 years after the end of our relationship with you unless applicable law requires retention for a longer period of time.

**Aditinet TEQ App Profile Personal Information.** We will retain this personal information to preserve your profile as a partner. Your personal information will be held indefinitely but can be removed by contacting Aditinet UK customer services.

## Who might we share your information with?

We share the information that you provide to us with our staff so that we can provide our services to you.

We may share your personal information with selected third parties, some of whom we appoint to provide services, including:

- business partners, subsidiaries, suppliers and sub-contractors for the performance of any contract we enter into with you;
- analytics and search engine providers that assist us in the improvement and optimisation of our websites and Apps;
- cyber security services as part of our efforts to keep our site safe and secure.

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- Any member of our group, including parent companies and any subsidiaries of us and such parent companies, for the purposes for which the personal information was collected.
- to send notifications or account update information (including when new offers for existing or new services have been made available by us) by email, SMS text or app push notifications;
- any other organisation who you have directed Aditinet UK to share your information with.

There are certain exceptional circumstances in which we may disclose your information to third parties. This would be where we believe that the disclosure is:

- Required by law, or in order to comply with judicial proceedings, court orders or legal or regulatory proceedings
- In order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of our employees, customers, public, or others.
- Necessary for the prevention or detection of crime, including exchanging information with other companies or organisations for the purposes of fraud protection and credit risk reduction.
- Proportionate as part of a merger, business or asset sale, in the event that this happens we will share your information with the prospective seller or buyer involved.

## How do we protect your personal information?

Aditinet UK is committed to protecting your personal information and ensuring that we have adequate organisational and technical measures in place to do so. We try to ensure that all information you provide to us is transferred securely via the websites. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## All information you provide to us is stored on secure servers.

Where we have given you (or where you have chosen) a password that enables you to access certain parts of our service, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. By agreeing to this Privacy Notice and using our websites, Aditinet TEQ app, or other interactive services, you acknowledge that the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of personal information sent over the internet. Once we have received your information, we will use strict procedures and security measures to try to prevent unauthorised access.

## How you can help keep your personal information secure

We will take all reasonable measures to ensure that the personal information you provide through our websites is held and managed securely. Aditinet UK runs on a https platform and uses sophisticated security devices to protect your personal information. However, you can help keep your personal information safe - not just on our website, but whenever you provide information online.

Here are some simple ways you can improve the security of your information:

- Use a modern, secure browser and operating system
- Ensure that your browser and operating system have the latest security updates
- Use strong passwords and do not reuse them across multiple websites
- Keep your passwords private
- Learn about how email scams operate and exercise caution when using email
- Understand the risks of using public WiFi services

## What rights do you have in respect of your personal information?

The Data Protection Laws provide more provisions for you to exercise your rights when an organisation is processing your personal information. Where processing of your personal information is based on consent, you can withdraw that consent at any time.

Aditinet has a legal obligation to provide you with concise, transparent, intelligible and easily accessible information about your personal information and our use of it.

We have written this Privacy Notice to do just that, and it is located at <https://aditinet.uk/resources> under GDPR policy statement. If you have any questions or require more specific information, you can get in touch using our contact numbers or the Contact Us section of our website.

## Cookies

We use cookies to distinguish you from other users of our websites. This helps us to provide you with a good experience when you use our websites and allows us to improve our websites.

We use the following cookies for the following purposes:

- Strictly necessary cookies. These are cookies that are required for the operation of our websites. They include, for example, cookies that enable you to log into secure areas of our websites.
- Analytical/performance cookies. They allow us to recognise and count the number of visitors and to see how visitors move around our websites when they are using it. This helps us to improve the way our websites work, for example, by ensuring that users are finding what they are looking for easily.
- Functionality cookies. These are used to recognise you when you return to our websites. This enables us to personalise our content for you and remember your preferences.
- Targeting cookies. These cookies record your visit to our websites, the pages you have visited and the links you have followed to allow us to improve the page layout and navigation preferences.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our websites.

To optimise our service, we apply Google Analytics and our own statistical analyses.

- Google Analytics is a web analysis service provided by Google, which is used for purposes of market research and ensuring that the service meets user requirements. Google Analytics uses "cookies", which are placed on your computer to make it possible to analyse how you make use of the service. The information generated by the cookies about your use of the service (including your pseudonymised IP address) is as a rule transmitted to and stored by Google on servers in the United States. Google uses this information in order to evaluate your use of the service and to create reports on activities for the operator of the service. Google may also transmit this information to third parties if this is prescribed by law, or if third parties process the data on behalf of Google. On no account will Google connect your IP address with other Google data. At <https://tools.google.com/dlpage/gaoptout?hl=en-GB> you can, with effect for the future, opt out of the recording and saving of your data at any time. In addition we use Google Analytics remarketing and reports on demographic features and interests in order to display to website visitors relevant advertisements on the partner websites of the Google display and search network. The saving of cookies makes it possible to analyse user behaviour and activate interest-based advertising.

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**Third Party Links** - You may find links to third party websites on our websites. These websites should have their own privacy policies which you should check. We do not accept any responsibility or liability for their policies whatsoever as we have no control over them.

## Changes to our Privacy Notice

This Privacy Notice may be updated from time to time. Please check back frequently to see any updates or changes to our Privacy Notice. This Privacy Notice was last updated on 29 May 2020.

## Complaints

If you wish to make a complaint about our collection or use of your personal information, please contact us in the first instance so that we may seek to resolve your complaint.

In the event that you are not satisfied with our processing of your personal information, you have the right to lodge a complaint with the relevant supervisory authority, which is the Information Commissioner's Office (ICO) in the UK, at any time. The ICO's contact details are available here: <https://ico.org.uk/concerns/> or write to them at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow SK9 5AF.

## Contact us

If you have any queries, complaints or requests relating to any data protection matters, please contact our DPO at [admin@Aditinet.co.uk](mailto:admin@Aditinet.co.uk).

You may also write to us at:

Data Protection Officer - Aditinet UK Ltd, 40 Caversham Road, Reading, RG1 7ET

Signed:

Dated: May 2020